

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DISH NETWORK L.L.C.,
Plaintiff

Civil Action No. 4:20-cv-01678

Vs.

YAHYA ALGHAFIR, TEXAS
COMMUNICATION & TECHNOLOGY
LLC, SHENZHEN JIEMAO TECHNOLOGY
CO., LTD. and SHENZHEN STREET CAT
TECHNOLOGY CO., LTD., individually and
together d/b/a Super Arab IPTV,
Defendants.

Defendant Shenzhen Jiema Technology Co., Ltd.’s Response to Plaintiff’s

Second Motion for Entry of Default

COMES NOW, Defendant Shenzhen Jiema Technology Co., Ltd. “Jiema” and answers the Plaintiff’s Motion as follows:

The court just recently granted **Unopposed** Motion to Withdraw for Al-Azem as Attorney for Jiema (Dkt. 54). The Defendant Jiema is filling an answer to Plaintiff’s second motion for Entry of Default before hiring a new attorney to meet the deadline for filling an answer while at the same time is actively looking to hire a new attorney before the only one deadline currently pending in the case, which is

the set of trial date. The Court should deny Plaintiff's second motion for Entry of Default for the following reasons:

1. Jiemaos repeatedly sought to defend itself and timely responded to Plaintiff's Complaint and Motions.
2. The Court already denied Plaintiff's first Combined Motion for Entry of Default and Default Judgment against Defendants (Dkt. 37). The court stated in its order "The Court thus finds the motion for entry of default should be **DENIED** as to Jiemaos and denied without prejudice as to the other Defendants"
3. It is an improper, successive motion for Entry of Default and was filed outside the dispositive motions deadline.

Conclusion

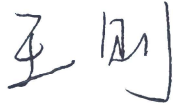
For these reasons, the Defendant prays the Court denies Plaintiff's second motion for Entry of Default (Dkt. 55).

Dated: July 15, 2022.

Respectfully submitted,

Defendant,

SHENZHEN JIEMAOS TECHNOLOGY CO., LTD.

A handwritten signature in black ink, consisting of stylized Chinese characters '王' (Wang) and '则' (Ze), written together.

Ze Wang,

superarabiptv@hotmail.com

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